

April 14, 2017

**VIA ECF**

The Honorable Sarah Netburn  
Thurgood Marshall U.S. Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *Coordinated RMBS Trustee Actions Against Wells Fargo Bank, N.A.*,  
Nos. 14-cv-9371; 14-cv-9764; 14-cv-10067; 14-cv-10102; 15-cv-10033

Dear Judge Netburn:

We write on behalf of Plaintiffs in the above-referenced actions regarding unresolved issues with respect to discovery, as directed by the Hon. Katherine Polk Failla. Dkt. No. 307.

On April 11, 2017, defendant Wells Fargo Bank, N.A. (“Wells Fargo”) requested an extension of its April 13, 2017 deadline to respond to the *BlackRock*, *Commerzbank*, *Phoenix Light*, and *Royal Park* complaints to May 12, 2017. Dkt. No. 305. As to the *NCUA* case, Wells Fargo requested leave to file its answer, or other responsive pleading, until 30 days after: (a) *NCUA* files a further amended complaint; (b) *NCUA* informs Wells Fargo of its intention not to further amend its complaint; or (c) leave to replead is denied by the Court. *Id.* Although Plaintiffs did not oppose Wells Fargo’s request, Plaintiffs informed the Court that they may require additional discovery related to Wells Fargo’s anticipated affirmative defenses. *Id.* Similarly, Wells Fargo noted that it may also seek additional discovery in regards to its responsive pleadings. *Id.* To address any potential additional discovery, the parties respectfully requested the Court set a status conference on or about May 19, 2017 – the week after Wells Fargo’s proposed answer filing deadline.

Thereafter, on April 12, 2017, Judge Failla granted Wells Fargo’s request to extend its answer filing deadline to May 12, 2017 and directed the parties to raise “any unresolved issues with respect to [] discovery” with Your Honor. Dkt. No. 307.

The Honorable Sarah Netburn  
April 14, 2017  
Page 2

As such, and in accordance with Judge Failla's directive, Plaintiffs respectfully request the Court set a status conference on or about May 19, 2017 in order to address any unresolved issues with respect to potential additional discovery related to Wells Fargo's anticipated affirmative defenses.

Respectfully submitted,

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cc: All Counsel via ECF